



101NETLINK

PO Box 101 • Whitethorn, CA 95589

Main (707) 923-4000 • Fax (707) 383-4301

Email: inquiries@101netlink.com

www.101netlink.com

September 14, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: TV White Spaces
ET Docket Nos. 04-186 and 02-380

Dear Ms. Dortch:

My company, 101Netlink, provides fixed wireless broadband service in very rural Humboldt, Mendocino and Trinity Counties, California. We rely primarily on unlicensed spectrum to deliver broadband services to consumers that have little to no broadband choices. My father and I built our network from scratch using devices authorized under Part 15 rules the FCC adopted to open up 900 MHz, 2.4 GHz and 5 GHz spectrum for unlicensed broadband devices. Thanks to the Commission's initiatives, consumers in much of the 3 counties listed above can now experience true broadband Internet access and digital phone service. Here is a link of our service coverage over a year ago, since then we have expanded service areas as well as increased coverage in our existing areas:
<http://www.101netlink.com/servicearea.html>

101Netlink is very interested in utilizing television white spaces so that we can expand, improve and fill out our service areas. Our service area runs over 150 miles along the California Coastal Highway 101, an area known for its rural beauty and giant redwood forests. These natural beauties create major obstacles for delivering broadband services of which we are hoping the television white spaces might help alleviate. We are committed to deploying in the television white spaces spectrum as soon as equipment for point-to-multipoint service is commercially available.

I am pleased that the FCC will be acting on TV white space petitions for reconsideration in the near future. There are several proposals that would help us to deploy service:

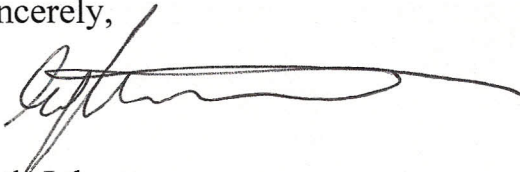
First, the FCC should allow WISPs to operate using base station antennas mounted higher than 30 meters, and we should be allowed to install customer antennas (CPE) at heights below 10 meters. If we could increase our base station antenna height up to 100 meters, we could cover three times more area with a base station and reduce our equipment, tower acquisition and tower lease fees by a large amount – an amount that could be the difference between deploying and not deploying in an area. We support the WISPA and Motorola proposals to increase base station height. By removing any minimum CPE height restrictions, we would not have to put tall masts on residences and we would be able to provide service at a lower cost.

Second, we believe we should be allowed to operate with power in excess of 4 Watts EIRP in rural areas. As is the case with tower height, operating with higher power will give us a greater coverage area and we will not need to spend as much money on infrastructure, again, an amount that could be the difference between deploying and not deploying in an area.

Third, we are very concerned about a proposal made by FiberTower and others to license white space spectrum for point-to-point wireless backhaul. Not only would adopting this proposal take six channels (36 MHz) and perhaps more channels away from us, but WISPs also would have to protect these licensed links. Moreover, channels and areas far beyond the links would be blocked because the signals from the licensed links would overshoot the path and the endpoints. This is due to the low-cost, low-gain antennas FiberTower wants to use. We also would not deploy if a licensed point-to-point user could come along later and put us out of business with a licensed link. We support the views expressed by WISPA in their September 8 letter and ask the FCC to reject the FiberTower proposal.

Thank you for the opportunity to weigh in on this very critical spectrum for rural America. My family and I have lived in the “woods” for three generations and unlicensed wireless broadband technology has allowed us to be successful, supportive and a major community contributor in the beautiful but technology challenged regions of rural California. We are excited about the possibility of this spectrum and hope you will consider the greater good of all in your decisions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Seth Johannesen', with a long horizontal flourish extending to the right.

Seth Johannesen
Partner/Operator
101Netlink
seth@101netlink.com
707-223-0790 Cell